REMARKS

In reply to the Office Action mailed May 10, 2007, please enter the amendments set forth above and consider the following remarks. By this Response, Applicant amends claims 17, 19-20 and 22, adds new claims 28-41, and cancels no claims. No new matter is added via this response. After entry of this paper, claims 17-22 and 28-42 will be pending in this application.

In the Office Action, the Examiner (i) rejected claims 17-22 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,416,604 to Park (hereinafter "Park"); (ii) rejected claims 17-22 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 5,959,675 to Mita et al. (hereinafter "Mita"); and (iii) rejected claims 17-19 and 21-22 under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,496,607 to Krishnamurthy et al. (hereinafter "Krishnamurthy"). Reconsideration is respectfully requested.

Claim Rejections Under 35 U.S.C. §102

Claims 17-22 stand rejected under 35 U.S.C. §102(b) as anticipated by Park, and under 35 U.S.C. §102(e) as anticipated by Mita. Additionally, claims 17-19 and 21-22 stand rejected under 35 U.S.C. §102(e) as anticipated by Krishnamurthy. Applicant traverses, and submits the amended claims above to even further clarify the claimed invention and obviate these rejections.

Without acquiescence, in the interests of expediting prosecution and avoiding additional costs, independent claim 17 is amended to even more clearly distinguish Applicant's innovations from the cited art. Specifically, claim 17 has been amended to

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clarify "partitioning," "transform[ing]" and "rate control[ing]" features recited in claim 17. Furthermore, amended claim 17 now recites the "spatial data content" and "coding mode," as per the specification.

Applicant submits that none of Park, Mita, or Krishnamurthy disclose each and every element of amended claim 17. For example, nowhere does Park, Mita, or Krishnamurthy disclose the limitation of "a rate control component that maps each *unique pair* of a class of features of said groups of data, and a quantization parameter to a *unique estimate* for a number of coding bits, wherein spatial data content and coding mode are factored into the estimation process by the utilization of said class of features," as recited in amended claim 17.

As such, unlike the rate control methods of Park, Mita, and Krishnamurthy, where the quantization parameter is mapped to the estimate for the number of coding bits with a continuous function of low degrees of freedom, the rate control method of claim 17 maps each unique pair of the class of the features and the quantization parameter to a unique estimate for the number of coding bits. Moreover, unlike the rate control methods of Park, Mita, and Krishnamurthy, which are designed and updated by using a *general* quantization parameter and the actual number of coding bits observed for *all* the previously coded data entities, the rate control method of the present invention is designed and updated by using the actual number of coding bits observed for previously coded data entities (groups of blocks) getting mapped only to a *certain class* and quantized with a *particular* parameter.

Amended independent claim 17 is allowable for at least the above reasons. Accordingly, Applicant submits that rejections under §102(b) and §102(e) should be

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withdrawn and the claim allowed. Additionally, because claims 18-22 depend on

independent claim 17, Applicant respectfully submits that claims 18-22 are also

allowable for at least these reasons.

Conclusory Remarks

New claims 28-41 recite subject matter akin to that of claims 17-22 and are

allowable over the cited references for reasons consistent with those stated above.

In view of the above, it is respectfully submitted that claims 17-22 and 28-41 are

now in condition for formal allowance, and early and favorable action to that effect is

respectfully requested.

The Examiner is invited to call Applicant's attorney at the number below in order

to expedite the prosecution of this application.

The Commissioner is hereby authorized to charge any fees which may be

required, or credit in the overpayment, to Deposit Account No. **07-1896** referencing

Attorney Docket No. **352000-902002**.

Respectfully submitted,

DLA PIPER U.S. LLP

Dated: August 10, 2007

By: _____
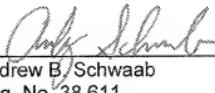
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